

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, on behalf of herself and
others similarly situated,

Plaintiff,

v.

REGISTER.COM, INC.

Defendant.

Case No.: 1:25-cv-00275-JPH-MJD

Judge: Robert J. White

Magistrate Judge: Mark J. Dinsmore

JOINT SUPPLEMENTAL REPORT ON THE STATUS OF DISCOVERY

Pursuant to this Court’s June 24, 2025 Order, ECF No. 29, Tiffany Lewis (“Plaintiff”) and Register.com, Inc.¹ (“Defendant”) (jointly, the “Parties”) submit this Joint Report on the Status of Discovery. The information provided herein is intended to supplement the Status Report submitted by the Parties on October 20, 2025.

Joint Report on the Status of Discovery

1. A detailed description of all discovery completed to date.
 - On October 24, 2025, Defendant provided its second supplemental document production to Defendant.
 - On October 27, 2025, the parties met and conferred to discuss and confirm the nature of the data provided through the second supplemental document production. Following this conversation, counsel for Defendant, Abbey Block, sent a summary of the data produced to counsel for Plaintiff via email.
 - The data provided through the second supplemental document production was relied upon by the parties during their first mediation session, which was conducted on October 31, 2025. Although the mediation session was productive, the parties did not ultimately reach a resolution. However, in their continued efforts to resolve this dispute,

¹ On July 25, 2025, Register.com, Inc., merged with Network Solutions, LLC. For the sake of clarity and consistency with the current case caption, Defendant is referred to herein simply as “Register” or the “Company”.

the parties have agreed to engage in a second mediation session, which is currently scheduled to occur on November 24, 2025.

2. A detailed description of all discovery presently scheduled or pending, including the due dates for any pending discovery requests and the scheduled dates for any depositions, and the identity of the counsel responsible for completing such discovery.

- Given that the parties are currently scheduled to engage in a second mediation session on November 24, 2025, neither party has scheduled its depositions at this juncture.

3. A detailed description of any discovery disputes presently pending, including the status of the resolution of the dispute and the identity of the counsel responsible for resolving the dispute.

- There are currently no outstanding discovery disputes.

4. A detailed description of all discovery that is planned to be completed within the 28-day period following the report, including the identity of the counsel responsible for completing such discovery.

- The completion of further discovery will also likely hinge on the parties' ability to successfully mediate this dispute.
- If the mediation is unsuccessful, the Plaintiff intends to file a motion to ensure complete and proper compliance with this Court's Order, including complete verified responses and responsive documents.
- If the mediation is also unsuccessful, the Plaintiff, through Anthony Paronich, plans to take the Defendant's 30(B)(6) deposition.

5. A description of all known discovery remaining to be completed in this matter, including a proposed timetable for the completion of such discovery and the identity of the counsel responsible for completing such discovery.

- Aside from the items notated above, Plaintiff's future discovery will include a Fed. R. Civ. P. 30(b)(6) Notice and expert report related to identification of putative class members based on the Defendant's discovery responses and deposition. The Plaintiff will also depose the Defendant's expert, if an expert report is received.
- Aside from the items noted above, Defendant's future discovery efforts are likely to include an expert report related to the identification of the proposed class members. Defendant will also seek to depose Plaintiff's expert.
- The completion of further discovery will also likely hinge on the parties' ability to successfully mediate this dispute.

6. Any other discovery issues any party believes should be brought to the attention of the Court so as to avoid any further delays in the completion of discovery in this matter.

- None at this time.

Dated: November 17, 2025

/s/ A. Jeff Ifrah
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Counsel for Plaintiff and the proposed class

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of November 2025, I filed the foregoing with the Court's electronic filing system, which will automatically provide notice to all counsel of record.

Dated: November 17, 2025

/s/ A. Jeff Ifrah
A. Jeff Ifrah